

DOCKET FILE COPY ORIGINAL

Sutherland, Asbill & Brennan

1275 PENNSYLVANIA AVENUE, N. W.

WASHINGTON, D. C. 20004-2404

TEL: (202) 383-0100

FAX: (202) 637-3593

999 PEACHTREE STREET, N.E.
ATLANTA, GEORGIA 30309-3996
(404) 853-8000

1270 AVENUE OF THE AMERICAS
NEW YORK, NEW YORK 10020-1700
(212) 265-5100

FRANK J. MARTIN, JR.
DIRECT LINE: (202) 383-0146

October 4, 1993

RECEIVED

OCT - 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

RECEIVED

OCT - 4 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

VIA HAND DELIVERY

Irving Gastfreund, Esq.
Kaye, Sholer, Fioerman, Hays & Handler
901 15th Street N.W.
Washington, D.C. 20005

Re: Miramar Beach FM Proceeding - MM Docket NO. 93-178

Dear Irving:

I enclose, pursuant to Administrative Law Judge John M. Frysiak's Order Prior to Prehearing Conference herein, released July 9, 1993, two bound and tabbed copies of Mark and Renee Carter's Documentary Exhibits (including Standard Integration Statement) and Signed Frozen Sworn Testimony.

I understand that you are in possession of the original of Joint Exhibit 1 and that you will exchange an appropriate exhibit for the Joint Exhibit today.

Sincerely,



Frank J. Martin, Jr.

cc (w/enclosure) VIA HAND DELIVERY:

The Honorable John M. Frysiak
Administrative Law Judge
Federal Communications Commission
2000 L Street N.W.
Room 223
Washington, D.C. 20554

No. of Copies rec'd
List A B C D E

1 Copy

INDEX

Testimony of Mark Carter Exhibit 1

**Exhibit 2 to Carters' Application on
FCC Form 301, Program Service Statement Attachment 1**

**Joint Engineering Statement on Behalf
of Howard B. Dolgoff and Mark and
Renee Carter Attachment 2**

**High School Yearbook Photographs of
Mark and Renee Carter from 1975
through 1978 Attachment 3**

**Letters and Note Regarding Work
for C.O.P.E. Center Attachment 4**

**Letter and Newspaper Article Regarding
Work for Bay Elementary School Attachment 5**

**Integration and Diversification
Statement of Mark and Renee Carter Attachment 6**

Testimony of Renee Carter Exhibit 2

**Exhibit 2 to Carters' Application on
FCC Form 301, Program Service Statement Attachment 1**

**Joint Engineering Statement on Behalf
of Howard B. Dolgoff and Mark and
Renee Carter Attachment 2**

**High School Yearbook Photographs of
Mark and Renee Carter from 1975
through 1978 Attachment 3**

**Letters and Note Regarding Work
for C.O.P.E. Center Attachment 4**

**Letter and Newspaper Article Regarding
Work for Bay Elementary School Attachment 5**

**Integration and Diversification
Statement of Mark and Renee Carter Attachment 6**

EXHIBIT 1

WRITTEN DIRECT TESTIMONY OF MARK CARTER

RECEIVED

OCT - 4 1993

**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY**

My name is Mark Carter. My wife Carol Renée Carter and I, as joint co-proprietors, are applicants for a new FM station on Channel 292A at Miramar Beach, Walton County, Florida. My wife and I, and our four children, reside at Route 2, Box 2810, Santa Rosa Beach, Florida 32459.

It was at our request that Channel 292A was assigned to Miramar Beach. On January 25, 1989, Renée initiated a rulemaking (RM-6669) which, after comments and other pleadings, resulted in assignment of Channel 292-A to Miramar Beach by the Commission's Report and Order in MM Docket No. 89-126, adopted September 27, 1991, released October 9, 1991.

By our application for Channel 292-A at Miramar Beach filed on December 24, 1991 (File No. BPH-911224MD) ("Application"), we seek Commission authorization to build a 3kW facility to serve Miramar Beach and surrounding areas.

As stated in Exhibit 2 to our Application of December 24, 1991 (a copy of Exhibit 2 to our Application is appended hereto as Attachment 1), we propose to install auxiliary power both at the studio and at the transmitter site of our proposed station.

As shown at page 2 of Joint Exhibit 1 (a copy of which is appended hereto as Attachment 2), our proposed station will provide a 60 dBu or better signal to 42,016 persons located in Miramar Beach and surrounding areas, and to a total area of approximately 798 square kilometers including, as shown on Figure 1 (Attachment 2), the entire town of Santa Rosa Beach where Renée and I reside.

As shown at page 3, on Figure 2, and in Table 3 of the same Joint Exhibit 1 (Attachment 2), although the competing proposal of Howard B. Dolgoff (File No. BPH-11223ME) will cover additional population and area, all persons and areas that would be served by either proposal are already served by more than five existing FM signals as well as other aural broadcast signals.

We have, since before our Application was filed, understood that after grant of a construction permit, but not before, we will be authorized by the commission's Rules to negotiate an arrangement with WKNV of Brewton, Alabama, whereby both WKNV and our station may mutually increase power to 6kW. We have from the first intended, and still intend, to seek such a mutually agreed power increase when a construction permit has been granted to us.

Apart from my interest in our application for Miramar Beach, I do not have any ownership or other interest in, or any connections with, any broadcast or other mass medium of communications.

I will work at the station on a full-time basis, i.e., 40 hours a week or more, as General Manager and Sales Manager. I will be responsible on a daily basis for station management and strategic planning, recruitment and supervision of sales staff, management and direction of account sales, commercial copywriting, and commercial production.

Reneé will serve as the station's Program Director and Business Manager. She too will work full-time, 40 hours a week or more. She will be responsible on a daily basis for program planning and direction, as well as office management. She will also have responsibility for format execution, music and playlist logging and rotation, daily program logs, all sales billing, payroll, and bookkeeping.

Reneé and I are at the present time self-employed on a part-time basis in leasing and maintaining a broadcast tower facility at Rt. 2 Box 2550, Santa Rosa Beach, Florida 32459, which is .3 miles and plainly visible from our residence, located approximately 6 miles from the proposed transmitter site of our proposed station. The leased tower facility is owned 25% by me, 25% by Reneé, and 25% each by my parents, Lois A.E. Carter (age 55) and Earnest R. Carter (age 63). My parents reside at Rt. 2 2580, Santa

Rosa Beach, Florida 32459, from which the leased tower facility, only .1 miles away, is plainly visible. I spend about three hours a week on tower business and Reneé spends about two hours. We are in control of when maintenance and other work is done, and my parents are both available more or less on call to handle receipt of deliveries or other tasks requiring someone's presence at the site during weekday business hours or otherwise when Reneé and/or I might not be available because of our full time commitment to the proposed station.

From 1973 to 1980, I resided with my parents at Route 2 Box 78 (since changed to Box 2580), Santa Rosa Beach FL 32459. Renee and I attended high school at Freeport High School in Freeport, Florida, the only high school serving the Miramar Beach area, from 1974 to 1978. See photocopies from the Freeport High School Yearbooks of 1974 through 1978 appended hereto as Attachment 3 (Renee's maiden name was Bassett).

I have resided within the 60 dBu service contour of our proposed station since 1973, except for a period of 2 years and 11 months from June, 1980 to May, 1983, when Reneé and I who were married in april of 1980, resided at Highway 51 South, Breckenridge Courts Apartments, Carbondale, Illinois while attending South Illinois University. As stated, Reneé and I, and our four children now reside at Route 2, Box 2810, Santa Rosa Beach, which is well within the 60 dBu service contour of our proposed station. We intend to continue to make our home in Santa Rosa Beach. We previously resided from April, 1980 to May 1980 and from May, 1983 to August, 1983 at Route 2, Box 78 in Point Washington. Due to changes in the Postal system the small Point Washington postal service area was merged into the Santa Rosa main office in the mid-1980's and new box numbers were given to all postal patrons. This has resulted in my address change from Rt. 2 box 46, Point Washington to Rt. 2 Box 2810, Santa Rosa

Beach. Therefore, no actual movement of my residence occurred, except as noted above. As shown at Figure 1 of Joint Exhibit 1 (Attachment 2), Freeport, and Point Washington, as well as Santa Rosa Beach, are all well within the 60 dbu service contour of our proposed station.

I have for many years been extensively involved in civic and community activities including the following through December, 1991:

1985-1988	Member of the Walton County Chamber of Commerce
1986-1988	Board of Directors, Walton County Chamber of Commerce.
1985-1988	Volunteer on Publicity Committee for the Chautauqua Festivals held in May of each year. Handled writing production, and distribution of radio and television promotional ads to generate awareness and attendance of each event.
1985-1988	Volunteer and Group Captain of South Walton Membership Drive -- successful in creating the greatest increase in new membership to the Chamber.
1985-1988	Worked closely with Executive Director Ruby Rivard in producing a weekly Chamber radio awareness campaign that was distributed and aired throughout the country.
1985-1986	Board of Director/Member of the Emerald Coast Tourist Development Council--formed to develop strategy in promoting the Miramar Beach/Destin/Ft. Walton Beach area as a tourist destination.
1985-1987	Member of the Destin Chamber of Commerce
1985-1988	Involved with fundraising effort for the Destin Fishing Rodeo and sponsored the Dolphin Award.
1983-1991	Volunteer Speaker for Dr. Edward Freese, professor at Okaloosa/Walton Community College. Was called upon to speak for one hour both in the fall and spring semester of each year about broadcasting, radio production, and careers in radio and television to his media class of about 30.
1986-1991	Officer/Board Member/Volunteer for Chautauqua Offices of Psychotherapy and Evaluation (C.O.P.E. Center) which is Walton County's full-service community mental health center employing over 90 people and a yearly budget of almost \$2 million dollars.

1987-1988	Vice-President of the C.O.P.E. Board of Directors
1988-1991	President of the C.O.P.E. Board of Directors
1985-1991	Chairman of Fundraising Committee and responsible for yearly fundraising efforts including a charity dance, fun run, cookbook origination and sales, community telemarketing, and other yearly fundraising efforts.
1988-1991	Member of Building Committee and involved with property site selection, planning, designing, and opening of the C.O.P.E. Center's Outpatient Clinic on Highway 331 in De Funiak Springs.
1989-1991	Walton County Board President representative to the monthly District One Alcohol, Drug, and Mental Health meetings held in Pensacola to discuss problems with state funding, site evaluation, and improved implementation to better serve clients in Walton County (Miramar Beach).
1986-1991	Writer, Producer, Director of C.O.P.E. Center video productions used for community awareness and employee training purposes. Final edited production on each was approximately thirty minutes and was aired on local TV stations.
1986-1991	Writer, Producer, Announcer of C.O.P.E. Center radio campaign which dealt with drug and alcohol abuse, child abuse, marriage counseling, teen suicide, and the Help Line. Distributed radio announcements to all area radio stations and campaign resulted in greater service awareness to citizens in the Miramar Beach area.
1985	Coordinator and Production Volunteer for C.O.P.E. video production of three public service announcements produced by WKRG-TV in Mobile, AL. Post-production involved a two-hour drive to Mobile to attend editing session. Assisted with air schedule purchasing of announcements and documentation of promotional schedule. Production and schedule was paid for by a state grant.
1988-1991	Organized C.O.P.E. Center's Community Advisory Council and attended quarterly meetings for the community input on needs of the people of Walton County.
1989	Organized successful opening of C.O.P.E. Miramar Beach Mental Health Office in South Walton County. Negotiated long-term building lease in return for in-kind donation and assisted with media campaign to make public aware of new office in South Walton County.
1990-1991	Produced, installed, and maintained C.O.P.E. Center's Information on Hold feature on their main telephone system allowing callers to

be informed of all C.O.P.E. services while on hold. Audio was updated on a monthly basis.

- 1990** Designed HELP LINE billboard and negotiated price, materials, and supervised its installation on Highway 331 South with LaMar Outdoor Advertising.
- 1988-1991** S.T.A.R. (Students Taking Active Responsibility) Program Volunteer and Coordinator -- STAR is an acclaimed state-wide program for elementary and middle school students that teaches drug prevention, alternatives to peer pressure, and healthy lifestyles.
- 1988-1991** S.T.A.R. Parent Volunteer -- assisted with classroom instruction and special projects of anti-drug student video production. "Drugbusters," which was produced in 1989 at Walton Middle School was both shown at the State Drug Convention in 1989 as well as all Walton County middle schools which incorporate the S.T.A.R. program.
- 1990** Assisted in formation of S.T.A.R. Grant writing proposal to the State of Florida and produced a ten-minute program overview video to accompany the application.
- 1991** S.T.A.R. Volunteer and Producer/Director of S.T.A.R. video "Live to Tell," produced at Bay Elementary School. The dramatic 45-minute production was shown in Walton County elementary and middle schools as part of their drug prevention program.
- 1987** University of West Florida Small Business Development Center -- Volunteered as part of a Media/Student project where students interview the needs and develop a complete media advertising campaign for a local radio station complete with logo design and television commercials. Project lasted for three months.
- 1985-1991** Volunteer at Bay Elementary School.
- 1985-1991** Member of Bay Elementary PTA organization.
- 1988-1990** Vice-President of the Bay Elementary PTA organization.
- 1990-1991** President of the Bay Elementary PTA organization.
- 1985-1991** Fundraising Volunteer for Bay Elementary School of the following projects: Fall Carnival 1985-1991, Bay Auction 1988-1991, Christmas Program 1990-1991, Bay Yearbook 1989-1990, Bay Cookbook 1991, and other fundraising efforts.
- 1990** Volunteered to install school-wide closed circuit TV system providing education programming access to all classes.

- 1990-1991** Volunteer/Parent Coordinator of BAY-TV, the student produced morning TV program aired daily in the school. Volunteered for 2-4 hours daily (Monday-Friday) and organized a radio/TV instruction workshop daily for Bay Elementary fifth and sixth graders.
- 1990** Volunteer and Co-Producer of student produced Christmas video entitled: "Christmas At Eden" taped at a local historic mansion with the entire student body's involvement. Copies of the finished video were sold and over \$1,000 was raised for purchase of audio/video supplies for the school.
- 1991** Negotiated, helped transport, and install satellite TV dish and receiver for Bay Elementary School to enhance educational programming via closed-circuit TV system. Installed wiring for new channel and relocated student studio and equipment.
- 1991** Volunteer -- "Breakfast With Bay" -- helped organize and work a day long community awareness breakfast and tour of school involving local business people. Conducted own tour group through school including extensive question and answer session with community leaders.
- 1988-1991** Classroom Volunteer at Bay Elementary School.
- 1990** Organized Field Trip to the State Capitol for all Bay Elementary 4th graders. Arranged for local funding, set up itinerary, and helped supervise day-long educational outing.
- 1991** Walton County United Way Volunteer -- assisted with the South Walton Committee in fundraising and public speaking at area businesses to employees.

Since December, 1991 I have continued active in the following areas of community involvement, member of the Surfside Middle School Band Boosters 1992-present, active in fundraising activities including production of a Christmas Dance video, Seafood Festival, Vadalisa Onion Sales, and a Miracle Strip Amusement Park Promotion. I also helped organize the 1993 Annual Bay Elementary Auction and helped in securing donations, as well as working at the actual event. See the letters of July 9, 13, and 14, 1993, the handwritten note received in May of 1991 and the updated memorandum received in May of 1993, regarding continuing work for the C.O.P.E. Center, appended hereto as Attachment 4. See also the letter dated July 14, 1993 and the appended

newspaper clipping of May, 1993, regarding work for Bay Elementary School, appended hereto as Attachment 5.

I have been active in broadcasting, and have the following broadcasting, including full-time broadcast managerial experience:

- 1988-1989 ^{1/}** Broadcast Consultant for WWAV-FM Santa Rosa Beach, Florida-in areas of station billing, traffic, and programming. WWAV-FM was formerly licensed to Carter Broadcasting, Inc. which was owned 25% by me, 25% by Renee, and 25% each by my parents Lois A.E. Carter and Earnest R. Carter.
- 1985-1989** President/General Manager/Sales Manager of WWAV Santa Rosa Beach, Florida -- responsible for all station operations including overall sales, production, management and engineering.
- 1985-1989** President of Carter Broadcasting, Inc. licensee of WWAV-FM in Santa Rosa Beach, FL. Santa Rosa Beach is a community adjacent to Miramar Beach, FL.
- 1984-1985** Television Account Executive at WJHG-TV in Panama City, FL owned by Grey Communications. Responsible for sales, creative origination and production assistance of commercial accounts in both Panama City and Miramar Beach area.
- 1982-1984** Television Account Executive at WEAR-TV in Pensacola, FL owned by Rollins Communications. Established successful results in Ft. Walton Beach at newly opened sales office. Responsible for sales, creative origination, and production assistance of commercial accounts in Pensacola, Ft. Walton Beach as well as Miramar Beach itself.
- 1980-1982** Broadcast Engineer and Announcer at WDDD-FM/WDDW-AM in Marion, IL owned by 3D Communications. Also responsible for execution of weekend newscasts and special event programming.
- 1980-1982** Television Producer/Director/Radio Newscaster/Reporter for WSIU-TV and WSIU-FM at Southern Illinois University at

^{1/} These dates were erroneously given as 1989-1991 on our Integration and Diversification Statement filed July 26, 1993 (Attachment 6). In other respects our Integration Statement (Attachment 6) is true and correct to the best of my knowledge, information, and belief.

Carbondale, IL.

1979-1980 Broadcast Engineer/News caster at WKGC-FM at Gulf Coast
Community College, Panama City, FL.

In addition to the foregoing broadcast experience, I have two degrees relevant to broadcasting: a Bachelor of Science Degree magna cum laude in Radio-Television with a specialization in Sales/Management from Southern Illinois University at Carbondale in 1982, and an Associates of Arts Degree in Mass Communications with a specialization in Radio Broadcasting from Gulf Coast Community College in Panama City, FL in 1980.

I declare, under penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information and belief.

Name :

Mark S. Carter

Date :

10 / 1 / 93



RECYCLED

ED11

ALL-STATE LEGAL SUPPLY CO. 1-800-222-0610

Attachment 1 to Exhibit 1

**Exhibit 2 to Carters' Application
on FCC Form 301, Program Service Statement**

MARK AND RENEE' CARTER
NEW FM STATION
CH 292A - 106.3 MHZ - 3KW
DECEMBER 1991

EXHIBIT #2

PROGRAM SERVICE STATEMENT

Mark and Renee' Carter propose to serve the community of Miramar Beach and South Walton County with a diverse array of programming to deal with several "key" issues of local concern. Local news and public affairs programming is planned in both short and long program format to cover many issues of local priority for this growing, beachfront community. Some of the main issues of concern for Miramar Beach residents include growth management of sensitive beachfront areas, future development of Topsail Hill and the other 11,000 acres of real estate adjacent to Miramar Beach that is now in Resolution Trust Corporation control, construction and maintenance of new roads for residential areas, better representation in county government and more control on where the money is spent, an improved county public schools system with the new elementary school approved by the State of Florida for construction south of Choctawhatchee Bay to be built within close proximity to Miramar Beach, further enhancement of the local tourist industry with more emphasis on Miramar Beach and South Walton County as a year-round tourist destination, and the creation of new industry and more jobs for the youth of the area. In addition, special programming would be provided in the case of a major hurricane through the proposal of auxillary power at the studio and transmitter site. Much needed emergency information would be coordinated through a local Radio Hurricane Alert Action Plan involving both the Walton County Civil Defense office in DeFuniak Springs and local emergency management personnel.

Attachment 2 to Exhibit 1

**Joint Engineering Statement on Behalf of
Howard B. Dolgoff and Mark and Renee Carter**

**JOINT ENGINEERING STATEMENT
MM DOCKET NO. 93-178
APPLICATIONS OF
HOWARD B. DOLGOFF
(FCC FILE NO. BPH-911223ME)
MARK AND RENÉE CARTER
(FCC FILE NO. BPH-911224MD)
FOR CONSTRUCTION PERMIT FOR A NEW
FM STATION ON CHANNEL 292A IN
MIRAMAR BEACH, FLORIDA**

This joint engineering statement has been prepared on behalf of Howard B. Dolgoff (hereafter "Dolgoff") and Mark and Renée Carter (hereafter "Carter"). Dolgoff and Carter have mutually exclusive applications pending (FCC File Numbers BPH-911223ME and BPH-911224MD, respectively) for a construction permit for a new FM station on Channel 292A in Miramar Beach, Florida.¹ This case was designated for hearing in MM Docket No. 93-178.²

The undersigned has independently determined the population and land area within each proposal's 60 dBu (1 millivolt per meter (mV/m)) contour. The undersigned also has verified that the areas predicted to receive 60 dBu (1 mV/m) or better signal strength under the respective proposals for Channel 292A at Miramar Beach, Florida, currently are served by more than five other aural broadcast services in addition to that proposed by the applicants. In the context of this statement, an FM station is said to provide service to an area when that FM station's predicted signal strength in the area is 60 dBu (1 mV/m) or better. Similarly, an AM

¹ Dolgoff proposes to operate with maximum effective radiated power of 6 kilowatts and antenna radiation center height above average terrain of 100 meters (102 meters above mean sea level) at 30° 23' 31" North Latitude, 86° 18' 25" West Longitude. Carter proposes to operate with effective radiated power of 3 kilowatts and antenna radiation center height above average terrain of 100 meters (102 meters above mean sea level) at 30° 23' 07" North Latitude, 86° 18' 03" West Longitude. The proposed sites are 0.9 kilometer apart.

²See *Hearing Designation Order*, Released June 29, 1993, 8 FCC Rcd 4337 (1993).

Joint Engineering Statement
Miramar Beach, Florida

Page 2

station is said to provide service to an area when that AM station's predicted daytime groundwave signal strength in the area is 0.5 mV/m or greater. A description of the methodologies used in preparing the studies contained herein follows the presentation of the findings.

Figure 1 of this statement shows the respective calculated 60 dBu (1 mV/m), F(50,50) contours for the Dolgoff and Carter proposals. According to the 1990 Census, the Dolgoff proposal will provide signal strength of 60 dBu or better to 54,447 persons residing in 1,062 square kilometers, and the Carter proposal will provide signal strength of 60 dBu or better to 42,018 persons residing in 798 square kilometers. Thus, the Dolgoff proposal would provide 60 dBu (1 mV/m) or better signal strength to 12,429 persons more than would the Carter proposal. Further, the Dolgoff proposal would provide 60 dBu (1 mV/m) or better signal strength to an area 249 kilometers larger than would the Carter proposal.

The distances to the 60 dBu contours depicted in Figure 1 of this statement were determined using the conventional methodology described in Section 73.313 of the FCC's Rules. The height above average terrain in each radial direction was determined by subtracting the average terrain elevation along a given radial from the antenna radiation center height above mean sea level specified by the respective applicant. The resultant height above average terrain was used in determining the distance to the 60 dBu contour in that radial direction. Terrain data were obtained from the National Geophysical Data Center 30-second terrain elevation database.

Distance-to-contour calculations were made at five-degree intervals to show accurately the predicted 60 dBu contour for the Dolgoff proposal which specifies a directional antenna. For the purposes of consistency, the location of Carter's 60 dBu contour also was calculated at five-degree intervals, even though Carter proposes use of a nondirectional antenna. The data used in preparing the map of Figure 1 are contained in Tables 1 and 2 of this statement.

Joint Engineering Statement
Miramar Beach, Florida

Page 3

Figure 2 of this statement is an other services study showing the presence of more than five other aural broadcast services providing 60 dBu (1 mV/m) or better signal strength within the Channel 292A, Miramar Beach, Florida, 60 dBu (1 mV/m) contour proposed by Dolgoff. The 60 dBu (1 mV/m) contour proposed by Dolgoff is shown in Figure 2 as an arc with radius of 28 kilometers to comport with the methodology for preparing other services studies which evolved out of the Greenup, Kentucky, channel allotment rule-making proceeding.³ In particular, uniform terrain, nondirectional operation, and, with one exception, maximum facilities were assumed. The exception, consistent with the accepted procedure, was use of the actual rather than maximum facilities for Class C stations in determining the distance to the 60 dBu (1 mV/m) contour over uniform terrain. Had actual 60 dBu (1 mV/m) contours been used in preparing the study of Figure 2 of this statement in lieu of the simplified 60 dBu (1 mV/m) contours obtained using the methodology identified herein above, there would be no change in the conclusion drawn with respect to the number of other services.

Because Carter's proposed 60 dBu (1 mV/m) contour is completely enclosed by Dolgoff's proposed 60 dBu (1 mV/m) contour, only Dolgoff's proposed 60 dBu (1 mV/m) contour is shown on the other services study of Figure 2 of this statement. The area enclosed by Dolgoff's proposed 60 dBu (1 mV/m) contour is depicted in Figure 2 of this statement using a heavier line weight than that used to depict the 60 dBu (1 mV/m) contours of the other aural broadcast services. Table 3 of this statement is a tabulation of the facilities used in preparing the other services study.

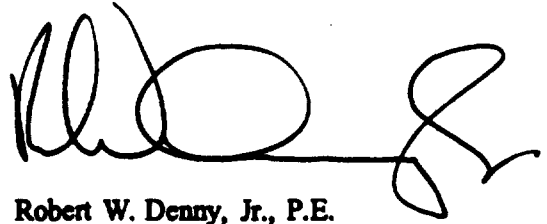
The other services study found herein identifies only the minimum number of stations needed to show more than five other aural broadcast services within the respective proposed 60 dBu (1 mV/m) contours. Other broadcast stations not shown on Figure 2 or identified in Table 3 provide 60 dBu (1 mV/m) or better signal strength, in the case of FM broadcast stations, or

³See *Memorandum Opinion and Order*, Released April 27, 1989, 4 FCC Rcd 3843 (1989), and *Memorandum Opinion and Order*, Released March 11, 1991, 6 FCC Rcd 1493 (1991).

Joint Engineering Statement
Miramar Beach, Florida

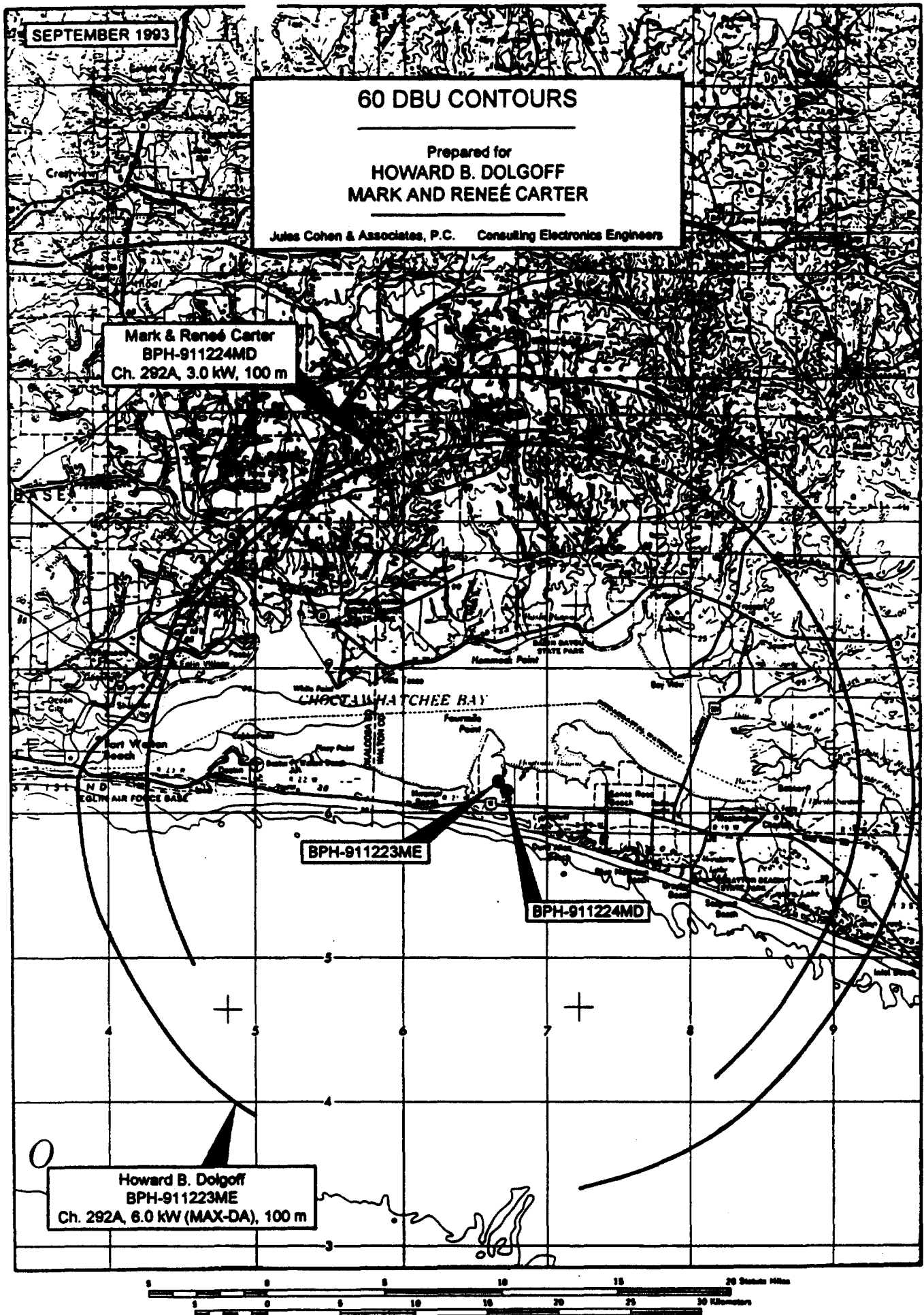
Page 4

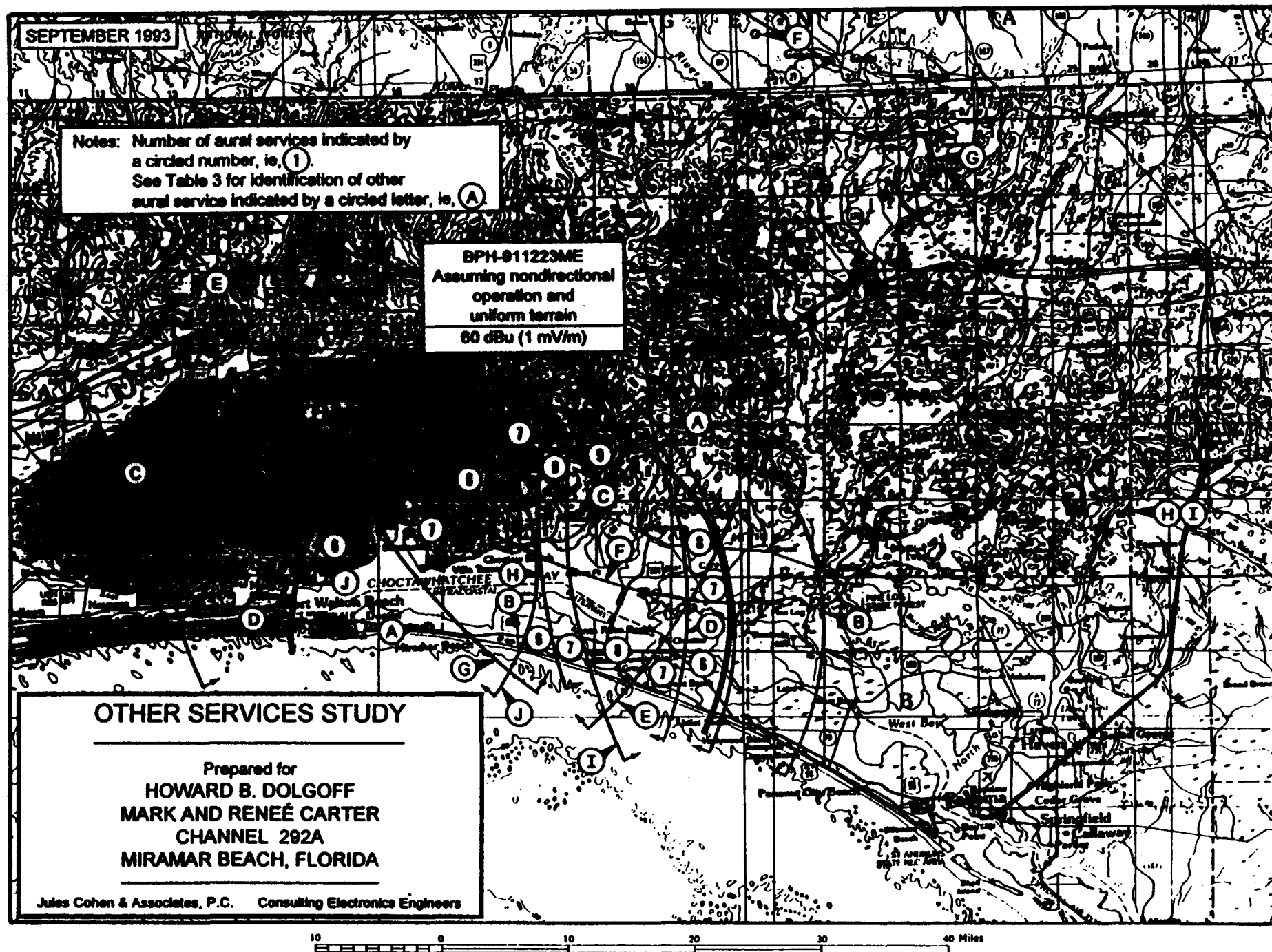
provide 0.5 mV/m or better signal strength, in the case of AM broadcast stations, within the respective 60 dBu (1 mV/m) contours proposed by Dolgoff and Carter at Miramar Beach.

A handwritten signature in black ink, appearing to read 'R. W. Denny, Jr.', with a stylized flourish at the end.

Robert W. Denny, Jr., P.E.

September 14, 1993





**JOINT ENGINEERING STATEMENT
MM DOCKET NO. 93-178
APPLICATIONS OF
HOWARD B. DOLGOFF
(FCC FILE NO. BPH-911223ME)
MARK AND RENÉE CARTER
(FCC FILE NO. BPH-911224MD)
FOR CONSTRUCTION PERMIT FOR A NEW
FM STATION ON CHANNEL 292A IN
MIRAMAR BEACH, FLORIDA**

Tabulation of Distances to 60 dBu Contour

FCC File No. BPH-911223ME
Howard B. Dolgoff
Ch. 292A, 6.0 kW (Max-DA), 100 m

Site Coordinates: 30° 23' 31" NL
86° 18' 25" WL

Antenna Radiation Center Height: 102 m AMSL

<u>Azimuth</u> (deg. T)	Antenna Radiation Center Height Above Average <u>Terrain</u> (meters)	Effective Radiated <u>Power</u> (dBk)	Distance to 60 dBu F(50,50) <u>Contour</u> (km)
0	95	7.78	27.8
5	96	7.78	28.0
10	97	7.78	28.1
15	98	7.78	28.2
20	99	7.78	28.4
25	101	7.78	28.6
30	101	7.78	28.6
35	101	7.78	28.7
40	102	7.78	28.7
45	102	7.78	28.7
50	102	7.78	28.7
55	102	7.78	28.7
60	102	7.78	28.7
65	102	7.78	28.7
70	102	7.78	28.7

FCC File No. BPH-911223ME
Howard B. Dolgoff
Ch. 292A, 6.0 kW (Max-DA), 100 m
(Continued)

Site Coordinates: 30° 23' 31" NL
86° 18' 25" WL

Antenna Radiation Center Height: 102 m AMSL

<u>Azimuth</u> (deg. T)	Antenna Radiation Center Height Above Average <u>Terrain</u> (meters)	Effective Radiated Power (dBk)	Distance to 60 dBu F(50,50) Contour (km)
75	102	7.78	28.7
80	102	7.78	28.7
85	102	7.78	28.7
90	102	7.78	28.7
95	102	7.78	28.7
100	102	7.78	28.7
105	100	7.78	28.5
110	99	7.78	28.3
115	98	7.78	28.3
120	99	7.78	28.3
125	98	7.78	28.3
130	99	7.78	28.4
135	99	7.78	28.3
140	101	7.78	28.6
145	102	7.78	28.7
150	102	7.78	28.7
155	102	7.78	28.7
160	102	7.78	28.7
165	102	7.78	28.7
170	102	7.78	28.7
175-210 ¹			
215	100	7.78	28.5
220	101	7.78	28.6
225	101	7.78	28.6
230	101	7.78	28.6

¹ The entire 3-16 kilometer portion of each radial in this range lies over the Gulf of Mexico. There is no U.S. land area beyond 3 kilometers within the 34 dBu F(50,50) contour in these directions.